

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

0:17-cv-02832 0:17-cv-04622
0:17-cv-04613 0:17-cv-04943
0:17-cv-04614 0:17-cv-04944
0:17-cv-04615 0:17-cv-04945
0:17-cv-04616 0:17-cv-04947
0:17-cv-04617 0:17-cv-05001
0:17-cv-04618 0:17-cv-05046
0:17-cv-04619

**DEFENDANT’S AFFILIATES’
MOTION TO INTERVENE FOR THE
LIMITED PURPOSES OF MOVING
TO COMPEL ARBITRATION AND
ENFORCE CLASS-ACTION
WAIVERS AND TO JOIN IN
DEFENDANT CENTURYLINK,
INC.’S MOTION FOR TEMPORARY
STAY OF DISCOVERY**

Defendant’s Affiliates – Intervenors Qwest Corporation, Embarq Florida, Inc., Embarq Missouri, Inc., Carolina Telephone and Telegraph Company LLC, Central Telephone Company, CenturyTel of Idaho, Inc., CenturyTel of Larsen-Readfield, LLC, CenturyTel of Washington, Inc., CenturyTel Broadband Services, LLC, and Qwest Broadband Services, Inc. (jointly the “Operating Companies”) – through undersigned counsel hereby move this Court pursuant to Federal Rule of Civil Procedure 24 and Local Rule 7.1 for an Order granting their motion to intervene for the limited purposes of moving to compel arbitration and enforce class-action waivers and joining in Defendant CenturyLink Inc.’s motion for temporary stay of discovery (the “Motion”).

The Operating Companies are ten subsidiaries of Defendant CenturyLink, Inc. that provided the services at issue in this Proceeding through contractual agreements with the named Plaintiffs. Under Federal Rule of Civil Procedure 24, the Operating Companies meet the requirements for mandatory and/or permissive intervention. They seek

intervention at this time for the limited purposes of (1) enforcing their contracts with the named Plaintiffs that require arbitration and contain class-action waivers and (2) joining Defendant CenturyLink, Inc.'s motion for temporary stay of discovery. More detailed grounds for this Motion are set forth in the accompanying Memorandum of Law and the Declarations of Kiran Seshagiri and Douglas P. Lobel exhibits attached thereto in support of the Motion.

Dated: April 2, 2018

Respectfully submitted,

/s/ Douglas P. Lobel

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